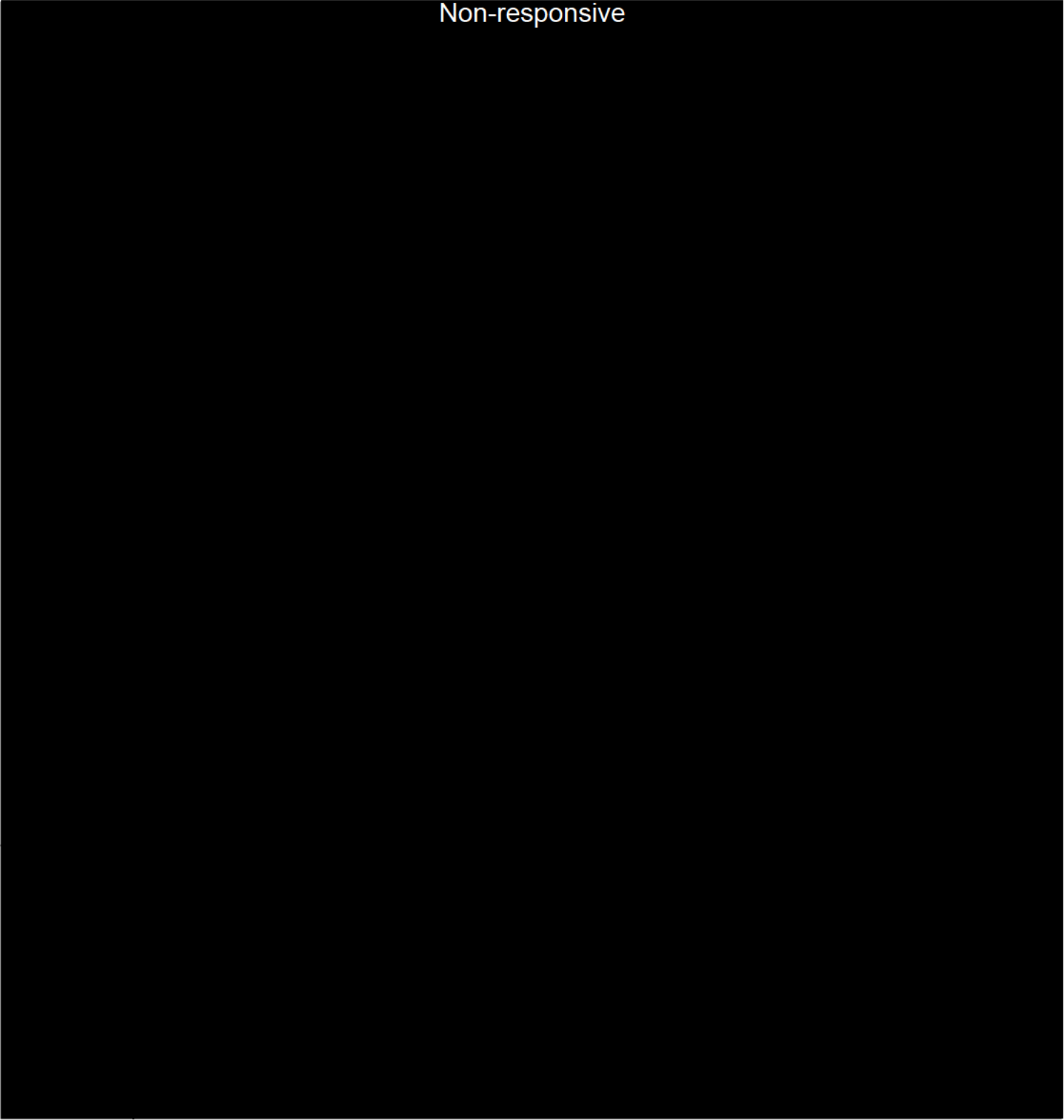



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. Jackson Boulevard
Chicago, Illinois**

Non-responsive



Non-responsive

Non-responsive



Non-responsive

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 SK Hand Tool Site - Removal Polrep
 Final Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region V**

Subject: POLREP #3
 final
 SK Hand Tool Site
 C574
 Defiance, OH
 Latitude: 41.2804630 Longitude: -84.3394590

To: thomas kenney, orc
 mark lehnert, defiance wastewater plant

From: Partap Lall, OSC

Date: 7/9/2012

Reporting Period: June 11 ,2012 to June 28, 2012

1. Introduction

1.1 Background

Site Number:	C574	Contract Number:	EP-S5-08-02
D.O. Number:	0107	Action Memo Date:	3/2/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/29/2012	Start Date:	5/17/2012
Demob Date:	6/28/2012	Completion Date:	6/28/2012
CERCLIS ID:	OHN000510633	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action

1.1.2 Site Description

S&K Hand Tool Corp., was a manufacturer of hand tools in Defiance, Ohio. One of the manufacturing activities was metal plating. They closed shop sometime in July, 2010. Several containers of waste remained at the site which includes metal plating related hazardous waste.

1.1.2.1 Location

The site is located at

135 Hickory Street
 Defiance, OH 43512

Latitude: 41.2804630
 Longitude: -84.3394590

1.1.2.2 Description of Threat

The facility is not secured and it has been vandalised. The local county commissioners had expressed concerns regarding the potential release of waste off site. Site assessment indicated corrosive, reactive and oxidizer waste materials. The site is located in a populated area in Defiance

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On November 30, 2011, EPA conducted a site assessment. During the assessment, EPA collected samples that showed drums SK-DRUM-001 and SK-DRUM-002 contained liquids with a pH of 2 standard units (SU), which according to regulations at 40 CFR 261.22, makes the waste hazardous for characteristics of corrosivity. Drum SK-DRUM-004 was found to contain cyanide, which according to regulations at 40 CFR 261.23, makes the waste hazardous for characteristics of reactivity. EPA also documented labeled hazardous waste marked with waste codes F006 and D007, which indicated the drums contain wastewater treatment sludges from electroplating per 40 CFR 261.31 (F006) and exceed the maximum concentration of contaminants for the toxicity characteristic for chromium per 40 CFR 261.24 (F007).

The wastes are unsecured, exposed to the elements, and can be accessed by anyone entering the site. Many of the drums are open. The OEPA has requested EPA's assistance in addressing environmental hazards at the site

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

6/11/2012 to 6/15/2012

The waste streams were finalized and samples were sent to ALS laboratory in Holland, MI. Small containers were consolidated in their respective waste streams, and the newly generated empty containers were crushed/cut and disposed of in a roll-off box.

- Acid waste stream containers were segregated on pallets and stretch wrapped for shipping
- The cleaning of the former heat and treat room (oil room) was completed and given a final broom sweeping
- The cleaning of the plating area began with the removal and disposal of the large piping and duct work debris.
- One full 30 cubic yard roll off box was picked up from the site and sent to Republic Landfill in Fort Wayne, IN on 6/15/12. An empty roll-off box was dropped off in its place.

6/18 to 6/22, 2012

The removal of large debris was completed in the polishing room. Debris was disposed of in roll-off boxes.

- Oil based paint, latex paint and grease waste streams were over-packed into one cubic yard lined HazBox waste containers in preparation for shipping. Plating area was cleared of all debris and broom swept
- Two roll-off boxes filled with RCRA empties and debris solids were shipped to Republic Landfill on both 6/19/12 and 6/20/12
- The cleaning in the polishing room was completed with a final broom sweeping
- The poly tank located outside of the facility that contained rainwater was drained of its contents and rendered unusable.
- The crushing/cutting and disposal of RCRA empty containers was ongoing throughout the week. Wastes were packaged and prepared for disposal.

6/25 to 6/28, 2012

All waste was shipped off-site to disposal facilities as shown in the progress metrics table below.

A final walk through was conducted with the local, county and township officials before handing over the control of the

site.

All equipment and personnel were de-mobilized on 6/28/2012.

1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Company is bankrupt, no viable PRP has been identified.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Sodium Hydroxide	Solid	55 gal	009654980 JJK	X	
Sodium Bisulphite	liquid	55 gal	009654981 JJK	X	
Base liquids cossosive	liquid	70 gal	009654982 JJK	X	
Sulphuric Acid	liquid	165 gal	009654980 JJK	X	
Hydrochloric Acid	liquid	180 gal	009654980 JJK	X	
Neutral Liquids (D007)	liquid	2106 gal	009654979 JJK	X	
Grease	semi-solids	2 cu yds	009654981 JJK		x
Latex Paint cans, off spec	liquid	1 cu yd	009654981 JJK		x
oil base paint, off-spec	liquid	1 cu yd	009654979 JJK		x
oil-water mix	liquid	2004 gal	010011811 JJK	X	
Tolylidene diisocyanate	liquid	40 lbs	010008982 JJK	X	
RCRA empty containers, non-haz	Solids	120 cu yd			x

R5 Priorities Summary		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	
	Cubic yards of contaminated sediments removed and/or capped	
	Gallons of oil/water recovered	
	Acres of soil/sediment cleaned up in floodplains and riverbanks	
Stand Alone Assessment	Acres Protected	2

	Number of contaminated residential yards cleaned up	
	Human Health Exposures Avoided	100
	Number of workers on site	8
Contaminant(s) of Concern		
Contaminant(s) of Concern Acids, Bases, TDI, Metallic waste		

2.2 Planning Section

2.2.1 Anticipated Activities

None, the removal action is complete

2.2.1.1 Planned Response Activities

None.

2.2.1.2 Next Steps

None

2.2.2 Issues

None

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

OEPA

Defiance County EMA

Sheriff's office

Defiance Water and Sewerage Department

South Richland Fire Department

4. Personnel On Site

EPA OSC

2 OTIE START members

5 EQM ERRS personnel

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.

Itemized Cost Summary

S & K HAND TOOLS SITE, DEFIANCE, OH SITE ID = C5 74

Cumulative Costs Through 08/31/2014

REGIONAL PAYROLL COSTS	\$39,358.39
REGIONAL TRAVEL COSTS	\$168.00
ENVIRONMENTAL RAPID RESPONSE SERVICES (ERRS)	
ENVIRONMENTAL QUALITY MANAGEMENT, INC. (EPS50802)	\$159,261.79
SUPERFUND TECH. ASSISTANCE & RESPONSE TEAM (START)	
WESTON SOLUTIONS, INC. (EPS50604)	\$4,053.81
ONEIDA TOTAL INTEGRATED ENTERPRISES LLC (EPS51010)	\$50,707.45
TECHNICAL SERVICE AND SUPPORT	
PRIMUS SOLUTIONS, INC. (EPW11024)	\$213.45
EPA INDIRECT COSTS	\$143,227.61
Total Site Costs:	\$396,990.50

**SK HAND TOOL SITE
DEFIANCE, DEFIANCE COUNTY, OHIO**

LIST OF SOURCE DOCUMENTS FOR CLOSE-OUT MEMORANDUM

Special Warranty Deed (filed for record in Defiance County, Ohio)

Grantor: Dresser Industries, Inc.
Grantee: SK Hand Tool Corporation
Date filed: 11/01/1983
Date recorded: 11/09/1983
Volume/Pages: 237/420-423

Defiance County Auditor's website: Data for Parcel J090030E00600 (print date 09/18/2014)

Bankruptcy Docket for Case No. 1:10bk28882

Court: U.S. Bankruptcy Court – Illinois Northern (Chicago)
Debtor: SK Hand Tool Corporation

Illinois Secretary of State corporation search results for SK Hand Tool Corporation (search date 12/5/2013).

Email

Date: 09/24/2014
From: Vickie Myers, Treasurer, Defiance County, Ohio
To: Sally Jansen, Enforcement Specialist, U.S. Environmental Protection Agency
Subject: Status of SK Hand Tool Site

Ohio Secretary of State corporation search results for SK Hand Tool Corporation (search date 12/12/2013).

Notice of Federal Lien (filed for record in Defiance County, Ohio)

File date: 01/07/2010
Debtor: SK Hand Tool Corporation
Secured Party: SK Hand Tool Corporation Pension Plan for Local Lodge No. 1356, in care of Pension Benefit Guaranty Corporation, Washington, DC
Volume/Pages: 340/Page 1644-1645

Defiance County Land Records website (search date 09/25/2014).

SK Hand Tool assets sold to Ideal Industries, *Crain's Chicago Business*, August 23, 2010.

Ideal Acquires Premier Tool Manufacturer SK Hand Tools, *Ideal Press Release*, August 23, 2010.

Ideal Industries, Inc. Letter to SK Hand Tool Customers, October 10, 2010.

Order Allowing Trustee to Abandon Assets of the Estate and Allowing Limited Notice to 20 Largest Creditors.

Bankruptcy Case No.: 1:10bk28882
Court: U.S. Bankruptcy Court – Illinois Northern (Chicago)
Debtor: SK Hand Tool Corporation